

REMARKS

Claims 1-44 are pending and at issue in the application with claims 1 and 24 being independent claims. Claims 1 and 24 have been amended. No claims have been added or cancelled. Reconsideration and withdrawal of the rejections in view of the remarks below is respectfully requested.

Claims 1, 2, 4, 5, 7-10, 15, 17, 19, 22-25, 27, 28, 30-34, 36, 42 and 43 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Nixon et al. (U.S. Pub. Appl. No. 2002/0077711) in view of Chapman et al. (U.S. Pub. Appl. No. 2004/0021679).¹ Claims 19, 22 and 26 were further rejected under 35 U.S.C. § 103(a) as being unpatentable over Nixon et al. and Dowling et al. in further view of Latzel (U.S. Pub. Appl. No. 2004/0230897). Claims 3, 16, 18, 29, 35, and 41 were rejected under 35 U.S.C. § 103(a) over Nixon et al. and Dowling et al. in further view of Spriggs et al. (U.S. Pat. No. 6,889,096) or Kall et al. (U.S. Pub. Appl. No. 2003/0149608). The applicants respectfully traverse the rejections in light of the amendments above and the remarks below.

Each of claims 1-44 recites a remote data viewing system or a method of viewing entity data collected or generated by a plurality of data source applications. In short, the system or method of claims 1-44 provides a technique for taking data from multiple data sources that provide different visualizations of information and providing a common visualization of information. That is, where a user sees information presented in different visual user interface display formats among the different data sources, the techniques of the claimed system and method allow a user to see the same information in a common visual user interface display format.

Specifically, the system or method includes a display of a navigational tree and a display view. The navigational tree includes selectable sections specifying different categories of entity data. Entity data associated with a selected section is presented in the display view in a predetermined viewing format, which is a common visual user interface display format for presenting entity data of each of the sections, such that the entity data is displayed in the same visual user interface format without presenting the same type of entity

¹ Although the action refers to this reference as "Dowling", the patent application publication lists "David John Chapman" as the first named inventor, with "Andrew Dowling" as one of the additional inventors. Accordingly, the applicants refer to this reference as "Chapman et al."

data in multiple different visual user interface display formats. At least some of the data source applications each presents the entity data in different visual user interface display formats.

The action has acknowledged that Nixon et al. does not disclose two or more of a plurality of data source applications that each present entity data in different viewing formats. The action has further acknowledged that Nixon et al. does not disclose a predetermined viewing format that is a common display format for presenting entity data associated with each of a plurality of sections specifying different entity data to be displayed in a same format without presenting a same type of entity data in multiple display formats (see action, pages 4, 11 and 12). For these reasons, the action cites Chapman et al. However, the combination of Nixon et al. and Chapman et al. fails to render any of claims 1-44 unpatentable, because the combination does not disclose all of the claimed features.

Simply put, the cited portions of Chapman et al. do not disclose or suggest that different data source applications present the entity data in different viewing formats. Moreover, the cited portions of Chapman et al. do not disclose or suggest a display that then presents entity data in a common display format for each of a plurality of sections specifying the different entity data to be displayed in the same format without presenting the same type of entity data in multiple different display formats.

In particular, the portions of Chapman et al. cited in the action, do not disclose or suggest that the sources of data present the collected entity data in different viewing formats. The action has cited and highlighted various portions of Chapman et al. relied upon as disclosing “different viewing formats,” portions of which are cited below (see action pages 4 and 13):

(paragraphs [0043]-[0052]): In a preferred form, the server systems include one or more of a variety of different server system, a small subset of which includes the server systems provided by Honeywell Limited and that are known as:

Plantscape;

Enterprise Buildings Integrator;

TPS;

TPA;

QCS;
Uniformance;
OPC; and
HCI.

Preferably, the data binding engine takes the data provided by the data source object model and applies it to the display page. More preferably, the data binding engine takes the data provided by the data source object model and applies it to the display page in a way defined by binding definitions contained in the HTML/L display page. Even more preferably, each display element that requires data has an associated binding definition that defines what data is required for the element and how it is to be applied to the element.

(paragraph [0174]): 4. The data source manager--refer to FIG. 1--through server-specific components, manages the real-time retrieval of data from the servers of interest, and supplies this data to the displays on the client.

(paragraph [0176]): It should be noted from FIG. 4 that the builder requires the ability to configure server-specific data access. The Hendrix HMI program allows the use of a single builder for industrial HMI products. In some embodiments, this builder is composed of server-specific components which allow this data configuration to take place. These components also allow the builder to be aware of issues such as server redundancy, data definitions, and server connection details.

The only thing that the action has done in citing these portions of Chapman et al., is demonstrate that Chapman et al. discloses different servers. As with Nixon et al., **these are not different viewing formats.**

Paragraphs [0043]-[0052] simply disclose a variety of different server systems, with some examples provided. Different servers does not disclose any viewing format, much less different viewing formats. It says nothing about the manner in which the data is displayed by each data server, and there is nothing inherent about a server having a particular viewing format.

Paragraph [0174] simply discloses that a data source manager retrieves data from the servers and supplies the data to the client's display. Again, it says nothing about the manner in which the data is displayed, or that the servers utilize different viewing formats.

Paragraph [0176] simply discloses features about a "builder", including configuration of server-specific access, and an awareness of server redundancy, data definitions and server connection details. Like paragraphs [0043]-[0052] and [0174], paragraph [0176] says nothing about the manner in which the different types of data are displayed by the different applications.

While the action concludes that Chapman et al. discloses "server specific data," this conclusion is irrelevant to the recitations of the claims, where the claims specify that different sources have different viewing formats.

The action further incorrectly asserts that Chapman et al. discloses a common display format for presenting entity data to be displayed in a same format without presenting a same type of entity data in multiple different display formats. Again, the action has cited and highlighted various portions of Chapman et al. relied upon as disclosing "a common display format," portions of which are cited below (see action pages 4 and 13):

(paragraph [0036]): Preferably, the display page is constructed using a mixture of standard HTML and XML tags. More preferably, the HTML describes presentation aspects of the display page--that is the page elements--while the XML tags describe what data is required for the page and how that data is to be applied to the page. Even more preferably, the infrastructure components assist with the parsing of the XML content of the display page, the delivery of data to the display page and the initiation of server commands from display page elements.

(paragraph [0040]): Preferably, the display page is HTML based.

(paragraph [0042]): Preferably also, the data source components are informed of the data requirements for a particular display page by means of a data source definition that is stored as part of an HTML/XML display page file.

(paragraph [0200]): Industry-Standard File Format

Paragraphs [0036], [0040] and [0042] disclose that a display page may be based on HTML and/or XML tags and stored as an HTML/XML file. Indeed, the action appears to assert that the disclosed XML/HTML pertains to the recited common display format. While HTML and XML generally refer to a markup language used for coding, it does not pertain to a display format that the user visually sees on a display screen. Simply using HTML or XML does not inherently mean that each display has the same layout. Indeed, HTML or XML may be used to offer very different display format, as opposed to a common display format. However, in order to prevent confusion on this point, the applicants have amended the claims to clarify and specify that the display format is a ***visual user interface display format***, as opposed to a simple markup language. If the Examiner has any further suggestions to clarify the claim language on this point, she is invited to contact the undersigned at her convenience.

Paragraph [0200] is a header on a section regarding file formats, and is largely irrelevant as it pertains to display formats, much less a common display format for presenting entity data to be displayed in a same format without presenting a same type of entity data in multiple different display formats.

Accordingly, while individual aspects of Nixon et al. and Chapman et al. may appear to disclose the various features of independent claims 1 and 24, the combination does not disclose the same arrangement of the features as provided in independent claims 1 and 24, because there is no aspect of Nixon et al. or Chapman et al. that corresponds to the recited different viewing formats of data sources or the common viewing format of the display application. It is clear that in order for a claim to be rendered *prima facie* unpatentable, "[all] words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). See MPEP 2143.03. As required by the Supreme Court in *KSR International Co. v. Teleflex Inc.*, 82 USPQ2d 1385 (2007) (*KSR*), the differences between the claimed invention and the prior art must still be ascertained, and both the invention and the prior art references must be considered as a whole. The result is that all claim limitations must still be disclosed in the prior art. See also *Ex parte Clapp*, 227 USPQ 972, 973 (Bd. Pat. App. & Inter. 1985), MPEP

706.02(j) and MPEP 2141. If all claims limitations are not disclosed in the prior art, then the rejection must fail.

Further, a person of ordinary skill in the art would not combine or modify Nixon et al. with Chapman et al. based on the rationale provided in the action (i.e., “to provide an easy method of population the framework with data from different server system and processes”) (see action, pages 5, 13 and 14 citing paragraph [0468] of Chapman et al.). This cited portion of Chapman et al. discloses an advantage associated with using the binding architecture to populate a user interface infrastructure (i.e., the framework) with data from the servers. It is an advantage pertaining to data transfer. It does not pertain to an advantage associated with user interfaces, such as the framework itself, much less with the other features cited by the action (i.e., different servers, HTML, XML), or with features as claimed (e.g., different visual user interface display formats of data sources or a common visual user interface display format of a display application). Simply put, one of ordinary skill in the art would not look to combine or modify these references. Consequently, Nixon et al. and Chapman et al. do not disclose each and every feature of claims 1-44, nor would it be obvious to combine or modify the references.

Accordingly, none of claims 1, 2, 4, 5, 7-10, 15, 17, 19, 22-25, 27, 28, 30-34, 36, 42 and 43 is rendered obvious by Nixon et al. or Chapman et al., whether taken alone or in combination. It therefore follows that Nixon et al. and/or Chapman et al. cannot render any of claims 3, 6, 11-14, 16, 18-22, 26, 29, 35, 37-40, 41 and 44 unpatentable either alone or in view of one of Spriggs et al., Kall et al. or Latzel, particularly given that none of these references have been relied upon as disclosing the above-discussed features.

For the foregoing reasons, reconsideration and withdrawal of the rejections of the claims and allowance thereof are respectfully requested. Two (2) independent claims remain in the application as previously paid for, and forty-four (44) total claims remain in the application as previously paid for. This response is being filed with a two-month extension of time, along with the required fee. The applicants believe no additional fee is due. However, the Commissioner is hereby authorized to charge any deficiency in the amount enclosed or any additional fees which may be required under 37 CFR 1.16 or 1.17 to Deposit Account No. 13-2855. Should the examiner wish to discuss the foregoing, or any matter of

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form, in an effort to advance this application towards allowance, the examiner is urged to telephone the undersigned at the indicated number.

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Respectfully submitted,

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